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January 27, 2022

By ECF

Honorable Lewis Liman
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *United States v. Cole Bridges*, 21 Cr. 65 (LJL)

Dear Judge Liman:

In an Order dated January 10, 2022, *see* Dkt. No. 28, the Court directed the defense to file a notice by January 28, advising whether it intends to make motions under the Classified Information Procedures Act (CIPA) and, if so, to propose an agreed-upon motions schedule. We write with the consent of the government to respectfully request an additional two weeks to file our notice and propose a schedule for the Court's consideration. This is our second request for an adjournment.

Based on classified and unclassified discussions with the government, we believe the parties may be able to reach an agreement concerning the classified discovery that could obviate the need for CIPA litigation. The government informs us that it has spoken with the equity holders and expects to have additional information relevant to such an agreement in two weeks. Should the parties fail to arrive at an understanding by February 11, we will seek leave to continue our negotiations or advise the Court of our intended motions.

Thank you for your consideration.

Respectfully submitted,

/s/

Deborah Colson
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Attorneys for Cole Bridges

cc: Government Counsel